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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTY-FOURTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	September 1, 2021 through September 30, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$272,944.40 (80% of \$341,180.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$1,985.65 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-fourth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing September 1, 2021 through September 30, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$341,180.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$272,944.40.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$903.73. The blended hourly rate of paraprofessionals during the Application Period is \$242.36.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$1,985.65 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$1,985.65.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$272,944.40 (80% of \$341,180.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$1,985.65 (100%), for a total amount of \$274,930.05, for the Application Period.

Dated: November 11, 2021
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
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Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	24.9	\$13,915.00
A004	Case Administration	10.4	\$2,066.50
A006	Employment / Fee Applications	1.9	\$551.00
A009	Meetings / Communications with AHC & Creditors	15.7	\$22,980.00
A019	Plan of Reorganization / Disclosure Statement	94.9	\$83,771.00
A020	Insurance Adversary Proceeding	262.0	\$217,897.00
		409.8	\$341,180.50

Exhibit B

Summary of Compensation by Professional

SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	33.5	\$56,950.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	8.6	\$9,460.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	59.3	\$83,020.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	11.3	\$15,255.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	62.4	\$49,920.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	27.5	\$19,937.50
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 U.S. Court of Appeals for the Federal Circuit - 2021	\$700.00	10.5	\$7,350.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	7.3	\$5,110.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	23.4	\$15,795.00
Heather Frazier	Associate / State of Florida – 2009 District of Columbia - 2017	\$675.00	10.6	\$7,155.00

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	32.7	\$18,802.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	32.5	\$18,687.50
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	46.1	\$23,050.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2017	\$315.00	8.9	\$2,803.50
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	17.8	\$4,094.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	6.2	\$1,426.00
Michael Lloyd	Project Assistant – Joined firm in 2021	\$195.00	9.3	\$1,813.50
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	1.9	\$551.00
	Totals		409.8	\$341,180.50
	Attorney Blended Rate	\$903.73		
	Paraprofessional Blended Rate	\$242.36		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Pacer	\$1,854.00
Westlaw	\$131.65
Total	\$1,985.65

Exhibit D

Time and Expense Detail

GILBERT LLP

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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

November 11, 2021
Invoice Number: 11324812
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2021

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	341,180.50	1,985.65	343,166.15
Total	341,180.50	1,985.65	343,166.15

TOTAL FEES \$ 341,180.50

TOTAL EXPENSES \$ 1,985.65

TOTAL FEES AND EXPENSES \$ 343,166.15

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Hudson, J.	9/01/21	Draft summary of insurance discounting analysis.	.40	290.00
Hudson, J.	9/02/21	Review outline of research on Issue #54.	.20	145.00
Gaske, A.	9/02/21	Review research re Issue #54.	.20	115.00
Gaske, A.	9/02/21	Outline process for post-confirmation update letter to insurers.	.10	57.50
Ogrey, S.	9/02/21	Review correspondence from Insurer #3 re settlement / confidentiality agreement.	.30	69.00
Kaminsky, E.	9/02/21	Research re Issue #54.	.20	100.00
Kaminsky, E.	9/02/21	Draft outline of research on Issue #54.	.20	100.00
Kaminsky, E.	9/02/21	Review process for post-confirmation update letter to insurers.	.10	50.00
Kaminsky, E.	9/02/21	Draft insurer letter.	1.30	650.00
Frazier, H.	9/03/21	Confer with A. Gaske and E. Kaminsky re additional insured issues.	.30	202.50
Gaske, A.	9/03/21	Confer with H. Frazier re research Issue #54 and research to include in letter to insurers.	.30	172.50
Kaminsky, E.	9/03/21	Meet with H. Frazier and A. Gaske re research on Issue #54.	.30	150.00
Kaminsky, E.	9/03/21	Continue researching Issue #54	2.40	1,200.00
Kaminsky, E.	9/03/21	Continue drafting insurer letter.	.80	400.00
Ogrey, S.	9/08/21	Review and revise new cases against Debtors.	.30	69.00
Johnson, K.	9/13/21	Confer with insurance litigation team re status and strategy.	.40	92.00
Kaminsky, E.	9/13/21	Continue drafting letter to insurers.	2.50	1,250.00
Gaske, A.	9/14/21	Research re Issue #54.	.40	230.00
Kaminsky, E.	9/14/21	Continue researching Issue #54	1.00	500.00
Gilbert, S.	9/15/21	Confer with team re insurance recovery strategy.	.40	680.00
Hudson, J.	9/15/21	Confer with team re post-confirmation insurance recovery strategy.	.40	290.00
Grim, E.	9/15/21	Confer with team re insurance recovery strategy.	.40	280.00
Rubinstein, J.	9/15/21	Confer with team re insurance strategy.	.40	320.00
Gaske, A.	9/15/21	Confer with team re post-confirmation insurance strategy.	.40	230.00

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Name	Date	Services	Hours	Amount
Sraders, S.	9/15/21	Confer with team re case developments and insurance strategy.	.40	230.00
Kaminsky, E.	9/15/21	Continue researching Issue #54.	2.10	1,050.00
Kaminsky, E.	9/15/21	Confer with team re insurance strategy post confirmation.	.40	200.00
Kaminsky, E.	9/16/21	Research Issue #54.	1.10	550.00
Kaminsky, E.	9/19/21	Revise coverage letter	1.80	900.00
Kaminsky, E.	9/22/21	Continue researching Issues #54 (0.6); draft memorandum re same (1.4).	2.00	1,000.00
Gaske, A.	9/24/21	Research re Issue #54.	.50	287.50
Hudson, J.	9/27/21	Revise insurance settlement demand analysis.	.90	652.50
Hudson, J.	9/27/21	Confer with Insurer #12 re settlement.	.10	72.50
Hudson, J.	9/28/21	Analyze next steps for recovering under D&O policies.	.20	145.00
Hudson, J.	9/29/21	Analyze next steps for pursuing D&O proceeds.	.10	72.50
Hudson, J.	9/29/21	Analyze next steps for insurance recovery.	.10	72.50
Wolf, D.	9/29/21	Revise correspondence to D&O insurers re coverage obligations.	.50	350.00
Gaske, A.	9/29/21	Review insurance-related documents recently added to Intralinks.	.20	115.00
Hudson, J.	9/30/21	Analyze next steps for insurance recovery.	.60	435.00
Grim, E.	9/30/21	Research issue re insurer demands.	.20	140.00
Project Total:			24.90	\$ 13,915.00

A004: Case Administration

Name	Date	Services	Hours	Amount
Lloyd, M.	9/01/21	Review bankruptcy and adversary dockets for recent filings (0.7); draft summary of same (0.4).	1.10	214.50
Lloyd, M.	9/07/21	Review bankruptcy and adversary dockets for recent filings (0.6); draft summary of same (0.5).	1.10	214.50
Johnson, K.	9/13/21	Review docket re confirmation order and insurer notices of appeal.	.10	23.00
Ogrey, S.	9/13/21	Review docket for confirmation order and notices of appeals filed by insurers.	.30	69.00
Lloyd, M.	9/13/21	Review bankruptcy and adversary dockets for recent filings (1.2); draft summary of same (1.0).	2.20	429.00
Johnson, K.	9/20/21	Review and organize order confirming plan and related documents.	.30	69.00

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Name	Date	Services	Hours	Amount
Lloyd, M.	9/20/21	Review bankruptcy and adversary dockets for recent filings (1.7); draft summary of same (0.9).	2.60	507.00
Ogrey, S.	9/23/21	Organize confirmation materials.	.40	92.00
Lloyd, M.	9/27/21	Review bankruptcy and adversary dockets for recent filings (0.9); draft summary of same (1.4).	2.30	448.50
Project Total:			10.40	\$ 2,066.50

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	9/09/21	Finalize July fee statement.	.70	203.00
Holland, P.	9/23/21	Draft August fee statement.	1.20	348.00
Project Total:			1.90	\$ 551.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	9/01/21	Confer with AHC re insurance strategy.	1.00	1,700.00
Quinn, K.	9/01/21	Participate in call with client and co-counsel re weekly update.	.50	550.00
Shore, R.	9/01/21	Confer with J. Rice re settlement analysis.	.80	1,080.00
Hudson, J.	9/01/21	Confer with AHC representative (J. Rice) re insurance settlement strategy.	.80	580.00
Hudson, J.	9/01/21	Confer with AHC re next steps in light of hearing.	.50	362.50
Grim, E.	9/01/21	Confer with AHC re outcome of hearing and next steps.	.50	350.00
Wolf, D.	9/01/21	Confer with J. Rice, R. Shore, and J. Hudson re insurance recovery strategy.	.80	560.00
Sraders, S.	9/01/21	Confer with AHC re confirmation hearing and next steps toward the Effective Date.	.50	287.50
Gilbert, S.	9/08/21	Confer with AHC re trusts.	.50	850.00
Gilbert, S.	9/08/21	Confer with AHC re trust issues.	1.30	2,210.00
Gilbert, S.	9/08/21	Confer with AHC re plan.	1.00	1,700.00
Gilbert, S.	9/09/21	Confer with AHC and K. Eckstein re trusts.	.50	850.00
Gilbert, S.	9/15/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	9/20/21	Confer with AHC re trustees.	1.00	1,700.00
Gilbert, S.	9/20/21	Confer with AHC re plan.	1.00	1,700.00
Gilbert, S.	9/23/21	Confer with client re plan issues.	1.00	1,700.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	9/25/21	Confer with AHC working group re NewCo and TopCo.	1.00	1,700.00
Gilbert, S.	9/27/21	Confer with AHC working group re NewCo issues.	1.00	1,700.00
Gilbert, S.	9/30/21	Confer with AHC re plan issues.	1.00	1,700.00
Project Total:			15.70	\$ 22,980.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	9/01/21	Attend confirmation hearing (6.8); confer with Debtors and others re results of confirmation hearing (1.2).	8.00	13,600.00
Quinn, K.	9/01/21	Attend confirmation hearing (partial).	6.30	6,930.00
Hudson, J.	9/01/21	Attend final day of confirmation hearing.	6.80	4,930.00
Grim, E.	9/01/21	Attend hearing re confirmation ruling.	6.80	4,760.00
Wolf, D.	9/01/21	Attend confirmation hearing (partial).	3.30	2,310.00
Frazier, H.	9/01/21	Attend hearing re confirmation.	6.80	4,590.00
Frazier, H.	9/01/21	Prepare for potential argument re co-defendant issues.	.80	540.00
Frazier, H.	9/01/21	Review confirmation order revisions re co-defendant issues.	.20	135.00
Leveridge, R.	9/01/21	Review key portions of confirmation hearing transcript and Court ruling re insurance issues.	1.60	2,240.00
Ogrey, S.	9/01/21	Review and revise emergency amendments made to confirmation schedule.	2.10	483.00
Sraders, S.	9/01/21	Analyze bankruptcy and local rules re appeals.	1.60	920.00
Sraders, S.	9/01/21	Research re equitable mootness.	2.40	1,380.00
Kaminsky, E.	9/01/21	Attend confirmation hearing (partial).	6.10	3,050.00
Hudson, J.	9/02/21	Review process for post-confirmation update letter to insurers.	.10	72.50
Frazier, H.	9/02/21	Review confirmation transcript re insurance-related issues.	.70	472.50
Johnson, K.	9/03/21	Review docket re Issacharoff fee issue.	.20	46.00
Gilbert, S.	9/05/21	Confer with K. Eckstein re trust structures.	.80	1,360.00
Frazier, H.	9/05/21	Communicate with J. Rubinstein re confirmation order issues.	.10	67.50
Wolf, D.	9/07/21	Review status of D&O insurance rights assigned under plan documents.	.40	280.00
Ogrey, S.	9/07/21	Review filed version of shareholder settlement agreement and compare to draft.	.70	161.00

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Name	Date	Services	Hours	Amount
Grim, E.	9/08/21	Review insurance-related portions of transcript from confirmation hearing and ruling.	.60	420.00
Gilbert, S.	9/09/21	Confer with K. Eckstein and K. Maclay re trusts.	.80	1,360.00
Grim, E.	9/09/21	Review plan to analyze post-confirmation discovery question.	.30	210.00
Johnson, K.	9/09/21	Review confirmed plan documents.	.20	46.00
Sraders, S.	9/09/21	Analyze plan provisions re deposition of officers and directors.	.30	172.50
Gilbert, S.	9/10/21	Confer with UCC re plan.	1.00	1,700.00
Johnson, K.	9/10/21	Review plan documents; draft citation re plan language.	.40	92.00
Quinn, K.	9/13/21	Participate in hearing (partial).	1.20	1,320.00
Sraders, S.	9/13/21	Review deadlines for appeal of confirmation order.	.10	57.50
Gilbert, S.	9/15/21	Confer with Debtors re NewCo insurance.	1.00	1,700.00
Gilbert, S.	9/15/21	Confer with co counsel re plan issues.	1.00	1,700.00
Quinn, K.	9/15/21	Confer with E. Grim, D. Wolf, J. Hudson and H. Frazier re MDT issues.	.30	330.00
Wolf, D.	9/15/21	Review materials re Trust insurance coverage.	.20	140.00
Hudson, J.	9/17/21	Confer with K. Quinn, E. Grim, D. Wolf and H. Frazier re MDT.	.30	217.50
Grim, E.	9/17/21	Confer with K. Quinn, J. Hudson, D. Wolf and H. Frazier re MDT.	.30	210.00
Grim, E.	9/17/21	Review plan to analyze issue re scope of releases and claims transferred to MDT.	.60	420.00
Wolf, D.	9/17/21	Confer with K. Quinn, J. Hudson, E. Grim, and H. Frazier re insurance analysis re potential third-party claims.	.30	210.00
Frazier, H.	9/17/21	Confer with team re MDT insurance.	.30	202.50
Frazier, H.	9/17/21	Analyze MDT insurance issues.	.50	337.50
Sraders, S.	9/17/21	Analyze causes of action transferred to MDT per plan.	2.00	1,150.00
Sraders, S.	9/17/21	Review opinion confirming plan of reorganization.	.10	57.50
Wolf, D.	9/18/21	Review materials re Trust insurance coverage.	.50	350.00
Gilbert, S.	9/20/21	Confer with MSGE re trustees.	.50	850.00
Quinn, K.	9/20/21	Confer with H. Frazier re appeals.	.20	220.00
Frazier, H.	9/20/21	Review confirmation order and modified bench ruling.	.50	337.50
Frazier, H.	9/20/21	Confer with K. Quinn re appeal issues.	.20	135.00
Sraders, S.	9/20/21	Analyze plan and supplements to determine which causes of action transfer to MDT.	3.00	1,725.00

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Name	Date	Services	Hours	Amount
Hudson, J.	9/21/21	Review final confirmation order findings re insurance.	.10	72.50
Hudson, J.	9/21/21	Respond to Debtors' request for input on NewCo policy purchases.	.50	362.50
Grim, E.	9/21/21	Review confirmation order for insurance-related findings.	.20	140.00
Johnson, K.	9/21/21	Review and compare proposed findings and final confirmation order.	.30	69.00
Sraders, S.	9/21/21	Review correspondence from D. Blabey (Kramer Levin) re appellate procedure post-confirmation.	.20	115.00
Sraders, S.	9/21/21	Review confirmation order for inclusion of proposed findings.	1.50	862.50
Gilbert, S.	9/22/21	Analyze outstanding questions re trusts and NewCo board.	.50	850.00
Hudson, J.	9/22/21	Review additional information provided by Debtors to supplement request for input on NewCo policy purchases.	.10	72.50
Gilbert, S.	9/23/21	Email correspondence re plan.	.50	850.00
Gilbert, S.	9/23/21	Confer with co-counsel re plan implementation.	1.00	1,700.00
Johnson, K.	9/23/21	Review and organize final trust distribution procedure (1.5); organize final plan and related documents (0.3); communicate with S. Sraders re exhibits to plan supplements (0.2).	2.00	460.00
Sraders, S.	9/23/21	Analyze plan provisions to determine post-emergence structure.	2.10	1,207.50
Gilbert, S.	9/24/21	Confer with MSGE re plan issues.	1.00	1,700.00
Sraders, S.	9/24/21	Analyze diagram of post-emergence structure to determine whether it conforms with confirmed plan.	1.10	632.50
Gilbert, S.	9/27/21	Confer with K. MacLay re trusts.	1.00	1,700.00
Gilbert, S.	9/27/21	Confer with MSGE re NewCo and TopCo.	.50	850.00
Hudson, J.	9/27/21	Review revised draft of first amended plan to confirm insurance treatment.	.10	72.50
Wolf, D.	9/27/21	Confer with M. Neely re D&O insurance placement for Trust.	.40	280.00
Johnson, K.	9/27/21	Review and organize exhibits to plan supplements.	2.60	598.00
Gilbert, S.	9/28/21	Confer with NAACP re plan issues.	1.00	1,700.00
Gilbert, S.	9/28/21	Confer with NCSG and MSGE re NAACP.	1.00	1,700.00
Gilbert, S.	9/28/21	Confer with A. Preis re trusts.	.50	850.00
Gilbert, S.	9/28/21	Confer with co-counsel re plan issues.	.50	850.00
Hudson, J.	9/28/21	Confer with Debtors (Davis Polk) re securing new coverage.	.10	72.50

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Name	Date	Services	Hours	Amount
Wolf, D.	9/28/21	Communicate with J. Hudson re D&O insurance recovery strategy.	.20	140.00
Grim, E.	9/29/21	Communicate with S. Ogrey and S. Sraders re trust agreement issues relevant to insurance placement.	.10	70.00
Wolf, D.	9/29/21	Confer with B. Kelly, S. Toomey, and M. Neely re D&O insurance procurement for trusts.	.70	490.00
Ogrey, S.	9/29/21	Review and organize TAFT, TAF LLC, NOAT, and TopCo trust agreements.	.70	161.00
Sraders, S.	9/29/21	Review plan documents and orders entered in bankruptcy proceeding.	.30	172.50
Quinn, K.	9/30/21	Analyze appeals issues.	.10	110.00
Sraders, S.	9/30/21	Draft chart showing insurance-related findings in plan and confirmation order.	1.50	862.50
Project Total:			94.90	\$ 83,771.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Rubinstein, J.	9/01/21	Telephone call with broker re reviewing materials for privilege (0.2); analysis relevant to case outline and discovery (2.7); begin reviewing confirmation bench ruling transcript as it relates to the adversary proceeding (1.1).	4.00	3,200.00
Rush, M.	9/01/21	Confer with J. Landis re subpoena.	.30	202.50
Gaske, A.	9/01/21	Review certain documents produced by insurers.	.60	345.00
Leveridge, R.	9/01/21	Communications with AON counsel and co-counsel re status of response to document subpoena from insurers.	.60	840.00
Leveridge, R.	9/01/21	Analyze status of adversary proceeding.	.90	1,260.00
Leveridge, R.	9/01/21	Communications with Debtors' counsel re AON issues.	.60	840.00
Shore, R.	9/02/21	Confer with team re status and strategy.	.70	945.00
Hudson, J.	9/02/21	Confer with National Union (J. Davis) re resolving policy period dispute.	.10	72.50
Hudson, J.	9/02/21	Confer with team re insurance adversary proceeding (partial).	.30	217.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	9/02/21	Continue review of bench ruling as relates to adversary proceeding (2.0); correspond with Debtors' counsel re document production (0.2); confer with litigation team re strategy (0.7); analyze litigation strategy (0.6); review insurer correspondence re discovery meet-and-confer requests (0.6); research re Rhodes (0.9).	5.00	4,000.00
Rush, M.	9/02/21	Review Navigators' deficiency letter.	.60	405.00
Rush, M.	9/02/21	Confer with team re case status and strategy.	.70	472.50
Johnson, K.	9/02/21	Review and organize recent discovery responses.	.20	46.00
Johnson, K.	9/02/21	Confer with M. Rush, J. Rubinstein, A. Gaske, R. Shore, R. Leveridge, J. Hudson, E. Kaminsky, and S. Martinez re status and strategy.	.70	161.00
Bonesteel, A.	9/02/21	Review 7/21 production from Liberty.	.50	157.50
Gaske, A.	9/02/21	Review status of pending discovery.	.20	115.00
Gaske, A.	9/02/21	Confer with team re maximizing insurance recovery strategy.	.70	402.50
Gaske, A.	9/02/21	Review insurer productions and delinquencies.	1.20	690.00
Leveridge, R.	9/02/21	Confer with team re status of projects (0.7); communications with co-counsel re discovery issues (0.8); review letters from insurance counsel re same (0.6).	2.10	2,940.00
Ogrey, S.	9/02/21	Review National Union and Liberty requests for production for documents they stated they were/were not going to produce.	.80	184.00
Kaminsky, E.	9/02/21	Confer with team re litigation update.	.70	350.00
Rubinstein, J.	9/03/21	Review correspondence from insurer counsel re Debtors' document production (0.4); confer with Debtors' counsel re same (0.2).	.60	480.00
Rubinstein, J.	9/03/21	Confer with Debtors' counsel re responses to insurer correspondence re discovery (0.6); analyze strategy re same (0.5).	1.10	880.00
Gaske, A.	9/03/21	Analyze Relativity re availability of productions; correspond with A. Crawford re certain insurer production availability.	.50	287.50
Leveridge, R.	9/03/21	Review letters from various insurers re discovery issues and case management issues (1.2); communications with Debtors' counsel re same (1.1).	2.30	3,220.00
Rubinstein, J.	9/04/21	Analyze TIG arbitration demand.	.30	240.00
Rubinstein, J.	9/05/21	Begin drafting response to September 2 Bates Carey letter re plaintiffs' document production (1.8); review AON objections to subpoena (0.2).	2.00	1,600.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	9/05/21	Communicate with AON counsel re subpoena and response thereto.	.20	280.00
Gilbert, S.	9/06/21	Analyze insurance recovery strategy.	.50	850.00
Rubinstein, J.	9/06/21	Revise response to Aspen re discovery.	1.60	1,280.00
Leveridge, R.	9/06/21	Review proposed talking points re responding to insurer's letter re Debtors' discovery responses (0.6); communicate with J. Rubinstein re same (0.2).	.80	1,120.00
Johnson, K.	9/07/21	Review and organize AON correspondence re subpoena.	.20	46.00
Rubinstein, J.	9/08/21	Review order of dismissal re arbitration insurers filed with Court.	.10	80.00
Johnson, K.	9/08/21	Review and organize National Union correspondence and response to plaintiffs' second request for production (0.4); review and organize Gulf, St. Paul, and Navigators discovery documents (0.4).	.80	184.00
Bonesteel, A.	9/08/21	Review incoming productions.	.50	157.50
Gaske, A.	9/08/21	Review insurer interrogatories (1.2); revise spreadsheet documenting insurer interrogatory responses re emphasizing certain responses (0.5).	1.70	977.50
Gaske, A.	9/08/21	Review Gulf and St. Paul requests for documents, interrogatories, and admissions.	.30	172.50
Gaske, A.	9/08/21	Review portion of St. Paul policy re tracking each page for policy comparison project.	.50	287.50
Gaske, A.	9/08/21	Correspond with A. Crawford re tags for document productions received.	.20	115.00
Leveridge, R.	9/08/21	Review communications re offensive and defensive discovery (1.6); communications with co-counsel re same (0.6).	2.20	3,080.00
Shore, R.	9/09/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, A. Gaske, S. Sraders, E. Kaminsky, A. Bonesteel, and K. Johnson re status and strategy.	.60	810.00
Shore, R.	9/09/21	Review status of litigation issues.	.90	1,215.00
Rubinstein, J.	9/09/21	Analysis re responses to multiple insurer discovery requests (2.2); confer with Debtors' counsel re same (1.1); confer with team re strategy (0.6).	3.90	3,120.00
Rush, M.	9/09/21	Confer with team re case status and strategy.	.60	405.00
Rush, M.	9/09/21	Confer with Debtors' counsel re document collection issues.	1.10	742.50
Johnson, K.	9/09/21	Confer with team re litigation status and strategy.	.60	138.00

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Name	Date	Services	Hours	Amount
Bonesteel, A.	9/09/21	Confer with J. Hudson, M. Rush, J. Rubinstein, R. Leveridge, R. Shore, S. Sraders, and K. Johnson re case status.	.60	189.00
Gaske, A.	9/09/21	Review most recent discovery requests and requests to meet-and-confer; draft list of outstanding requests.	.40	230.00
Gaske, A.	9/09/21	Review portion of St. Paul policy re tracking each page for policy comparison project.	1.80	1,035.00
Gaske, A.	9/09/21	Confer with Debtors' insurance counsel and team re outstanding discovery requests.	1.10	632.50
Gaske, A.	9/09/21	Confer with team re strategy for insurance recovery.	.60	345.00
Leveridge, R.	9/09/21	Review insurer correspondence and new discovery requests.	1.50	2,100.00
Leveridge, R.	9/09/21	Confer with Debtors' counsel re discovery and other issues raised by insurers in adversary proceeding.	1.10	1,540.00
Leveridge, R.	9/09/21	Confer with team re litigation status.	.60	840.00
Sraders, S.	9/09/21	Meet with team re current discovery progress and litigation strategy.	.60	345.00
Sraders, S.	9/09/21	Confer with Reed Smith (Debtors' counsel) and team re strategy for discovery responses.	1.10	632.50
Rubinstein, J.	9/10/21	Communicate with insurer counsel re meet-and-confer discussions related to discovery (0.3); revise correspondence to Gulf and St. Paul re document productions to plaintiffs (0.2).	.50	400.00
Johnson, K.	9/10/21	Draft list of relevant insurer contacts.	.90	207.00
Gaske, A.	9/10/21	Analyze number of documents in insurer productions (0.7); review draft correspondence to Certain Insurers re production of documents post entry of protective order (0.2).	.90	517.50
Leveridge, R.	9/10/21	Communications with Debtors' counsel and insurer counsel re discovery issues (0.2); prepare for meet-and-confer with insurers (0.7).	.90	1,260.00
Sraders, S.	9/10/21	Review requests for production sent to defendants.	.20	115.00
Rubinstein, J.	9/12/21	Review correspondence re review of insurer document productions.	.30	240.00
Shore, R.	9/13/21	Confer with J. Rubinstein re strategy.	.40	540.00
Rubinstein, J.	9/13/21	Confer with R. Shore re strategy (0.4); prepare for discovery meet-and-confer call (0.4); participate in meet-and-confer with Navigators and Debtors' counsel (0.6); review National Union discovery served upon plaintiffs and analysis re responses to same (0.8); draft response to TIG re arbitration staging (1.0).	3.20	2,560.00

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Name	Date	Services	Hours	Amount
Johnson, K.	9/13/21	Confer with A. Bonesteel and S. Ogrey re policy comparison.	.70	161.00
Johnson, K.	9/13/21	Review National Union discovery pleadings and calendar responsive deadlines.	.30	69.00
Bonesteel, A.	9/13/21	Meet with K. Johnson and S. Ogrey re policy comparison project updates.	.70	220.50
Bonesteel, A.	9/13/21	Review policy comparison project updates.	1.00	315.00
Gaske, A.	9/13/21	Review spreadsheet re policy comparison.	.20	115.00
Leveridge, R.	9/13/21	Participate in discovery meet-and-confer with C. Sorensen (Navigators) and Debtors' counsel (0.6); review discovery from National Union (0.6); follow-up communications with Debtors' counsel (0.5).	1.70	2,380.00
Ogrey, S.	9/13/21	Confer with A. Bonesteel and K. Johnson re upcoming policy review of insurer produced policies.	.60	138.00
Shore, R.	9/14/21	Communicate with J. Rubinstein and R. Leveridge re draft response to TIG.	.20	270.00
Rubinstein, J.	9/14/21	Revise draft response to TIG re arbitration (0.7); review insurance policy comparison tracking document and provide comments to same (0.4); confer with A. Gaske and M. Rush re same (0.6).	1.70	1,360.00
Rush, M.	9/14/21	Confer with J. Rubinstein and A. Gaske re policy review.	.60	405.00
Johnson, K.	9/14/21	Review Navigators discovery pleadings.	.10	23.00
Bonesteel, A.	9/14/21	Meet with A. Gaske re policy comparison project updates.	.80	252.00
Bonesteel, A.	9/14/21	Review policy comparison project updates.	.90	283.50
Gaske, A.	9/14/21	Confer with A. Bonesteel re policy comparison project.	.80	460.00
Gaske, A.	9/14/21	Confer with J. Rubinstein and M. Rush re policy comparison project.	.60	345.00
Gaske, A.	9/14/21	Communicate with J. Rubinstein re policy comparison project template.	.20	115.00
Gaske, A.	9/14/21	Review recent production from XL Insurance America.	.30	172.50
Leveridge, R.	9/14/21	Review communication from Navigators' counsel re discovery (0.2); review requests and responses (0.6).	.80	1,120.00
Leveridge, R.	9/14/21	Review draft response to TIG (0.3); communicate with J. Rubinstein and R. Shore re same (0.2).	.50	700.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	9/15/21	Participate in meet-and-confer with insurers re requests for production to plaintiffs (0.6); follow up analysis re same (0.3); revise correspondence to TIG counsel re arbitration (0.7)	1.60	1,280.00
Rush, M.	9/15/21	Meet-and-confer with insurers re discovery requests.	.60	405.00
Johnson, K.	9/15/21	Review plaintiffs' responses re AGLIC and Steadfast.	.20	46.00
Johnson, K.	9/15/21	Draft tracking chart re meet-and-confer schedule.	.20	46.00
Johnson, K.	9/15/21	Communicate with A. Gaske re XL America production.	.20	46.00
Gaske, A.	9/15/21	Analyze versions of St. Paul and Gulf policies re compare to produced versions.	2.90	1,667.50
Gaske, A.	9/15/21	Analyze recent insurer productions and discovery requests re tracking requests.	.60	345.00
Leveridge, R.	9/15/21	Participate in meet-and-confer with insurer counsel re discovery (0.6); follow up communications with Debtors' counsel re same (0.4); review discovery requests from AGLIC (0.7); review communications from opposing counsel re discovery (0.5).	2.20	3,080.00
Sraders, S.	9/15/21	Review correspondence re service of discovery requests.	.20	115.00
Rubinstein, J.	9/16/21	Analyze TIG arbitration issue (0.2); communicate with team re additional sets of discovery served on plaintiffs by insurer counsel (0.3).	.50	400.00
Johnson, K.	9/16/21	Review and organize NA Elite and Aspen discovery pleadings.	.20	46.00
Leveridge, R.	9/16/21	Review communications from co-counsel and opposing counsel re discovery.	.70	980.00
Rubinstein, J.	9/17/21	Analyze St. Paul and Gulf policy comparison re pending requests for admission (0.8); analyze NAE discovery requests served on plaintiffs (0.7); review correspondence from insurer counsel re meet-and-confer discussions (0.5); revise draft response to insurers re discovery issues (0.4).	2.40	1,920.00
Johnson, K.	9/17/21	Review and organize plaintiffs' production correspondence.	.20	46.00
Gaske, A.	9/17/21	Review status of pending discovery.	.20	115.00
Leveridge, R.	9/17/21	Review communications from opposing counsel and co-counsel re discovery.	.80	1,120.00
Hudson, J.	9/18/21	Revise response to deficiency letter.	.60	435.00
Hudson, J.	9/18/21	Confer with J. Davis re finalizing negotiations on policy period dispute.	.10	72.50

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Name	Date	Services	Hours	Amount
Hudson, J.	9/18/21	Review Navigators' discovery requests.	.10	72.50
Hudson, J.	9/18/21	Revise responses to discovery requests served by Aspen and NA Elite.	.20	145.00
Rubinstein, J.	9/18/21	Revise correspondence to insurers re discovery issues.	.80	640.00
Hudson, J.	9/19/21	Confer with J. Davis re resolving National Union motion for more definite statement.	.10	72.50
Hudson, J.	9/19/21	Review case citations for reference in deficiency letter response.	.10	72.50
Rubinstein, J.	9/19/21	Continue revising correspondence to insurer counsel re discovery issues.	1.50	1,200.00
Gilbert, S.	9/20/21	Confer with team re insurance strategy.	.20	340.00
Hudson, J.	9/20/21	Confer with team re settlement demands and discovery in adversary proceeding.	.20	145.00
Hudson, J.	9/20/21	Revise response to deficiency letter.	.10	72.50
Hudson, J.	9/20/21	Analyze responses to discovery requests to AHC.	.50	362.50
Grim, E.	9/20/21	Confer with team re litigation status and strategy.	.20	140.00
Rubinstein, J.	9/20/21	Analyze outstanding discovery requests served on plaintiffs (2.3); revise letter to insurer counsel re meet-and-confer discussion (1.4); communications with Debtors and UCC counsel re same (0.6); confer with R. Leveridge re discovery issues (0.6).	4.90	3,920.00
Rubinstein, J.	9/20/21	Confer with team re status of discovery in adversary proceeding.	.20	160.00
Rush, M.	9/20/21	Review draft discovery response letter.	.20	135.00
Rush, M.	9/20/21	Review insurers' discovery requests (1.0); communications with counsel re same (0.2)	1.20	810.00
Johnson, K.	9/20/21	Review and organize letter re 9/15 meet-and-confer.	.10	23.00
Johnson, K.	9/20/21	Review insurer discovery requests and calendar related dates.	.20	46.00
Johnson, K.	9/20/21	Draft list of outstanding insurer discovery requests and revise discovery dates.	.30	69.00
Bonesteel, A.	9/20/21	Organize all insurer production files.	.60	189.00
Gaske, A.	9/20/21	Confer with team re adversary proceeding discovery strategy.	.20	115.00
Leveridge, R.	9/20/21	Review discovery requests for insurers, letters from insurers and proposed responses re same (0.3); confer with J. Rubinstein re same (0.6); communications with Debtors' counsel, UCC counsel and opposing counsel re meet-and-confer scheduling (2.3); confer with team re adversary proceeding status and strategy (0.2).	3.40	4,760.00

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Name	Date	Services	Hours	Amount
Sraders, S.	9/20/21	Confer with team re outstanding issues and strategy for next steps.	.20	115.00
Kaminsky, E.	9/20/21	Confer with team re discovery status and strategy.	.20	100.00
Hudson, J.	9/21/21	Review Evanston involvement in proceeding.	.10	72.50
Hudson, J.	9/21/21	Analyze document management structure of AHC for responding to discovery requests.	.80	580.00
Hudson, J.	9/21/21	Confer with AHC co-counsel (Brown Rudnick, Kramer Levin, Otterburg) re document management structure of AHC for responding to discovery requests.	.10	72.50
Hudson, J.	9/21/21	Confer with National Union (J. Davis) re policy period dispute.	.40	290.00
Grim, E.	9/21/21	Communicate with R. Leveridge, J. Hudson, and H. Frazier re strategy for response to insurer document requests.	.20	140.00
Frazier, H.	9/21/21	Communicate with R. Leveridge, E. Grim and J. Hudson re Committee discovery.	.20	135.00
Johnson, K.	9/21/21	Confer with A. Bonesteel re production log and documents.	1.50	345.00
Bonesteel, A.	9/21/21	Confer with K. Johnson re document production and log.	1.50	472.50
Bonesteel, A.	9/21/21	Organize all insurer productions.	1.30	409.50
Leveridge, R.	9/21/21	Review communications from opposing counsel re discovery (1.1); communications with Debtors' counsel re same (0.5).	1.60	2,240.00
Sraders, S.	9/21/21	Review docket for Evanston Insurance Company filings.	.40	230.00
Kaminsky, E.	9/21/21	Revise coverage letter	1.40	700.00
Hudson, J.	9/22/21	Review list of issues for upcoming meet-and-confer session.	.10	72.50
Rubinstein, J.	9/22/21	Review discovery-related correspondence in preparation for meet-and-confer discussion with insurer counsel.	.80	640.00
Leveridge, R.	9/22/21	Analyze insurer letter re discovery issues (0.5); review requests and responses at issue (0.7); participate in call with Debtors' counsel re discovery issues (0.4); communicate with UCC counsel re same (0.3); follow-up communications with Debtors' counsel re schedule for responding to discovery requests (0.3); review draft responses to Gulf and St. Paul discovery (0.7).	2.90	4,060.00
Shore, R.	9/23/21	Confer with team re litigation status and next steps.	1.90	2,565.00
Hudson, J.	9/23/21	Confer with team re litigation strategy.	1.90	1,377.50

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Name	Date	Services	Hours	Amount
Hudson, J.	9/23/21	Attend meet-and-confer session with insurers re plaintiffs' responses to discovery requests and production of documents.	1.70	1,232.50
Hudson, J.	9/23/21	Review final TDPs in connection with discovery requests from insurers.	.70	507.50
Hudson, J.	9/23/21	Revise responses to discovery requests from St. Paul and Gulf.	.40	290.00
Hudson, J.	9/23/21	Review course of correspondence with insurers for reference in responding to discovery requests.	.20	145.00
Hudson, J.	9/23/21	Confer with AHC co-counsel re document management for responding to discovery.	.10	72.50
Grim, E.	9/23/21	Communicate with J. Hudson re issue relating to TDPs.	.10	70.00
Rubinstein, J.	9/23/21	Analyze litigation issues and strategy (1.7); meet with team re same (1.9); communications with Debtors' counsel re TIG arbitration issue (1.2); participate in meet-and-confer discussion with insurer counsel re Debtors' productions to insurers (1.7).	6.50	5,200.00
Rush, M.	9/23/21	Review draft responses to insurer discovery requests.	2.40	1,620.00
Rush, M.	9/23/21	Confer with team re litigation strategy and status.	1.90	1,282.50
Rush, M.	9/23/21	Meet-and-confer call with insurers re discovery responses,	1.70	1,147.50
Johnson, K.	9/23/21	Review order re insurer arbitration.	.10	23.00
Gaske, A.	9/23/21	Confer with team re litigation strategy.	1.90	1,092.50
Leveridge, R.	9/23/21	Participate in meet-and-confer re insurers' discovery to plaintiffs (1.7); follow-up communications with Debtors' counsel re same (0.6).	2.30	3,220.00
Leveridge, R.	9/23/21	Confer with Debtors' counsel re TIG proceeding (0.6); revise response to TIG discovery requests (0.8).	1.40	1,960.00
Leveridge, R.	9/23/21	Confer with team re key issues raised by insurers to review status of current research and need for additional projects.	1.90	2,660.00
Sraders, S.	9/23/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, M. Rush, A. Gaske, and E. Kaminsky re outstanding issues in adversary proceeding.	1.90	1,092.50
Sraders, S.	9/23/21	Communicate with A. Gaske and E. Kaminsky re research tasks.	.20	115.00
Kaminsky, E.	9/23/21	Confer with team re litigation strategy.	1.90	950.00

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Kaminsky, E.	9/23/21	Draft memorandum re choice of law issues (2.7); review policies re same (1.3).	4.00	2,000.00
Shore, R.	9/24/21	Confer with team re litigation status and settlement strategy.	.70	945.00
Hudson, J.	9/24/21	Confer with team re litigation and settlement strategy.	.70	507.50
Rubinstein, J.	9/24/21	Communications with R. Leveridge, M. Rush and S. Sraders re offensive discovery strategy (0.4); analyze status of various discovery projects (1.0); begin revising draft response to Gulf and St. Paul request for production, requests for admission, and interrogatories (0.3).	1.70	1,360.00
Rubinstein, J.	9/24/21	Confer with team re litigation and settlement strategy.	.70	560.00
Rush, M.	9/24/21	Review draft responses to insurer discovery requests.	2.00	1,350.00
Rush, M.	9/24/21	Research issues re governmental claims.	1.50	1,012.50
Rush, M.	9/24/21	Confer with team re litigation and settlement strategy.	.70	472.50
Johnson, K.	9/24/21	Confer with J. Hudson, R. Shore, R. Leveridge, A. Gaske, M. Rush, J. Rubinstein, S. Sraders, and E. Kaminsky re status and strategy.	.70	161.00
Johnson, K.	9/24/21	Review and organize XLIA production; revise discovery tracking spreadsheet.	.30	69.00
Gaske, A.	9/24/21	Review and tag policies produced re policy comparison project.	1.30	747.50
Gaske, A.	9/24/21	Review insurer correspondence tracking re missing correspondence.	.40	230.00
Gaske, A.	9/24/21	Confer with team re litigation and settlement strategy.	.70	402.50
Gaske, A.	9/24/21	Review status of pending projects and next steps.	.60	345.00
Leveridge, R.	9/24/21	Confer with team re status of adversary proceeding (0.7); review outstanding discovery requests and draft responses (1.4).	2.10	2,940.00
Sraders, S.	9/24/21	Confer with team re next steps in adversary proceeding.	.70	402.50
Sraders, S.	9/24/21	Research re application of self-insured retention in bankruptcy.	2.90	1,667.50
Kaminsky, E.	9/24/21	Confer with team re litigation and settlement strategy.	.70	350.00
Kaminsky, E.	9/24/21	Continue drafting memorandum re choice of law issues (1.7); review policies re same (2.5).	4.20	2,100.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	9/25/21	Revise responses to Gulf and St. Paul sets of discovery.	2.20	1,760.00
Leveridge, R.	9/25/21	Review and revise draft responses to requests for admissions and interrogatories tendered by Gulf and St. Paul.	1.30	1,820.00
Rubinstein, J.	9/26/21	Continue revising discovery responses to Gulf and St. Paul.	4.00	3,200.00
Gaske, A.	9/26/21	Review exhibit A to insurer requests for admission and compare with our version of exhibit.	.40	230.00
Leveridge, R.	9/26/21	Review comments from J. Rubinstein to draft responses to discovery requests from Gulf and St. Paul (0.3); revise same (0.9).	1.20	1,680.00
Gilbert, S.	9/27/21	Confer with insurance team re discovery strategy.	.50	850.00
Shore, R.	9/27/21	Review note to TIG re arbitration.	.30	405.00
Shore, R.	9/27/21	Confer with team re status, strategy, next steps.	.50	675.00
Hudson, J.	9/27/21	Confer with AHC co-counsel (Brown Rudnick, Kramer Levin, Otterburg) re document management system for responding to discovery requests.	.80	580.00
Hudson, J.	9/27/21	Revise responses to Aspen and North American Elite discovery requests.	.10	72.50
Hudson, J.	9/27/21	Confer with team re discussion with AHC co-counsel (Brown Rudnick, Kramer Levin, Otterburg) re responding to discovery requests.	.50	362.50
Rubinstein, J.	9/27/21	Revise communications with TIG (1.3); communicate with team re responses to NAE discovery sets served on plaintiffs (0.6); revise discovery responses to Gulf and St. Paul (1.2); confer with R. Leveridge, M. Rush, and S. Sradars re discovery (0.6); communicate with team re policy stipulations (0.2); confer with bankruptcy team re strategy (0.5).	4.40	3,520.00
Rush, M.	9/27/21	Confer with team re offensive discovery issues.	.50	337.50
Gaske, A.	9/27/21	Confer with R. Leveridge and J. Rubinstein re responses to Gulf and St. Paul discovery requests.	.40	230.00
Gaske, A.	9/27/21	Review most recent draft responses to discovery requests.	.10	57.50
Leveridge, R.	9/27/21	Communications with team re adversary proceeding (0.8); review outstanding discovery requests and draft responses (1.2); review communications with Debtors' counsel and UCC counsel re same (0.8).	2.80	3,920.00
Leveridge, R.	9/27/21	Confer with counsel for Ad Hoc Committee re discovery requests in adversary proceeding.	.80	1,120.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	9/27/21	Confer with M. Rush, J. Rubinstein, and S. Sraders re offensive discovery (0.6); review status of pending projects and next steps. (0.8).	1.40	1,960.00
Sraders, S.	9/27/21	Confer with R. Leveridge, J. Rubinstein, and M. Rush re offensive discovery.	.50	287.50
Kaminsky, E.	9/27/21	Confer with bankruptcy team re strategy.	.50	250.00
Kaminsky, E.	9/27/21	Draft research memorandum.	2.30	1,150.00
Hudson, J.	9/28/21	Participate in meet-and-confer session with National Union.	.30	217.50
Hudson, J.	9/28/21	Analyze document management in connection with defensive discovery.	.20	145.00
Hudson, J.	9/28/21	Review National Union letter re resolving motion for more definite statement.	.20	145.00
Hudson, J.	9/28/21	Review notes from past discussions to prepare for meet-and-confer with National Union.	.10	72.50
Hudson, J.	9/28/21	Analyze next steps following meet-and-confer with National Union.	.20	145.00
Johnson, K.	9/28/21	Review and organize AHC co-counsel discovery-related materials.	.20	46.00
Leveridge, R.	9/28/21	Review material re mediation for discovery purposes.	4.10	5,740.00
Leveridge, R.	9/28/21	Communicate with J. Hudson re National Union policy issue.	.30	420.00
Leveridge, R.	9/28/21	Communicate with co-counsel re TIG.	.20	280.00
Kaminsky, E.	9/28/21	Confer with insurer counsel re motion for more definite statement.	.30	150.00
Hudson, J.	9/29/21	Confer with AHC co-counsel re potentially responsive materials for discovery.	.40	290.00
Hudson, J.	9/29/21	Analyze next steps following meet-and-confer with National Union.	.20	145.00
Hudson, J.	9/29/21	Analyze Issue #44 in connection with adversary.	.30	217.50
Rubinstein, J.	9/29/21	Review documents re insurer discovery requests to plaintiffs.	1.30	1,040.00
Rush, M.	9/29/21	Review offensive discovery issues.	1.80	1,215.00
Johnson, K.	9/29/21	Review mediation protective order.	.30	69.00
Johnson, K.	9/29/21	Review Marsh production materials in connection with Gulf and St. Paul exhibits.	1.50	345.00
Gaske, A.	9/29/21	Review exhibits to Gulf and St. Paul requests for admission and compare to Debtors' documents.	2.00	1,150.00
Gaske, A.	9/29/21	Review and compare Debtors' versions of Aspen and Navigators policies with insurer versions of Aspen and Navigators policies.	1.50	862.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	9/29/21	Review status of discovery requests in adversary (1.7); confer with co-counsel re same (0.5); review potentially relevant orders, including protective order (0.6).	2.80	3,920.00
Leveridge, R.	9/29/21	Communicate with J. Hudson re National Union policy year issue.	.40	560.00
Leveridge, R.	9/29/21	Communications with team re offensive and defensive discovery.	.60	840.00
Sraders, S.	9/29/21	Research re Issue #3.	2.50	1,437.50
Sraders, S.	9/29/21	Research re Bermuda form policies.	.90	517.50
Sraders, S.	9/29/21	Analyze Issue #44.	.30	172.50
Kaminsky, E.	9/29/21	Draft memorandum re research related to Issues #1 and #2.	2.30	1,150.00
Shore, R.	9/30/21	Review appeal timing and moving forward on insurance settlement.	.50	675.00
Shore, R.	9/30/21	Confer with team re insurer defenses and responses thereto.	1.40	1,890.00
Shore, R.	9/30/21	Confer with team re litigation issues.	.50	675.00
Shore, R.	9/30/21	Revise note to client re discovery status.	.80	1,080.00
Shore, R.	9/30/21	Confer with team re insurance litigation settlement strategy and status.	.50	675.00
Shore, R.	9/30/21	Review insurance recovery strategy and next steps.	.60	810.00
Hudson, J.	9/30/21	Confer with team re litigation strategic planning.	1.40	1,015.00
Hudson, J.	9/30/21	Analyze potential defense cost arguments.	.20	145.00
Hudson, J.	9/30/21	Revise discovery update to AHC.	.10	72.50
Hudson, J.	9/30/21	Confer with team re insurance litigation and settlement strategy.	.50	362.50
Rubinstein, J.	9/30/21	Confer with team re litigation strategy (1.4); confer with A. Gaske re policy stipulation project (0.2); revise responses to pending sets of discovery served on plaintiffs (0.8); confer with team re strategy (0.5); analysis re production of documents in response to insurer requests for production (0.8); communications with R. Leveridge re discovery issues (0.5).	4.20	3,360.00
Rush, M.	9/30/21	Confer with team re litigation strategy.	1.40	945.00
Rush, M.	9/30/21	Review insurers' document productions.	1.60	1,080.00
Rush, M.	9/30/21	Analyze offensive discovery issues.	1.50	1,012.50
Rush, M.	9/30/21	Confer with team re case status and strategy.	.50	337.50
Johnson, K.	9/30/21	Review adversary proceeding scheduling order.	.10	23.00

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Johnson, K.	9/30/21	Confer with R. Leveridge, R. Shore, J. Hudson, A. Gaske, S. Sraders, M. Rush, E. Kaminsky, and A. Bonesteel re status and strategy.	.50	115.00
Bonesteel, A.	9/30/21	Confer with R. Shore, R. Leveridge, J. Hudson, M. Rush, A. Gaske, S. Sraders, E. Kaminsky, and K. Johnson re status and strategy.	.50	157.50
Gaske, A.	9/30/21	Confer with S. Sraders and E. Kaminsky re apportionment of research assignments.	.30	172.50
Gaske, A.	9/30/21	Confer with J. Rubinstein re policy stipulation strategy.	.20	115.00
Gaske, A.	9/30/21	Confer with team re insurance coverage strategy.	.50	287.50
Gaske, A.	9/30/21	Review relevant tracking information on various research topics (0.5); communicate with S. Sraders and E. Kaminsky re same (0.4).	.90	517.50
Gaske, A.	9/30/21	Confer with team re adversary proceeding strategy and research assignments.	1.40	805.00
Gaske, A.	9/30/21	Research Issue #54.	.60	345.00
Gaske, A.	9/30/21	Research missing correspondence.	.50	287.50
Leveridge, R.	9/30/21	Meet with team re issues raised by insurers.	1.40	1,960.00
Leveridge, R.	9/30/21	Draft report to AHC working group re status of discovery.	1.20	1,680.00
Leveridge, R.	9/30/21	Confer with team re outstanding matters.	.50	700.00
Leveridge, R.	9/30/21	Review communication from Navigators' counsel review Debtors' responses (0.4); communicate with UCC and Debtors' counsel re same (0.2); communicate with Navigators' counsel re same (0.2).	.80	1,120.00
Leveridge, R.	9/30/21	Review draft responses to discovery received from Gulf and St Paul (0.7); communications with counsel for Debtors and UCC re same (0.2).	.90	1,260.00
Leveridge, R.	9/30/21	Review material provided by AHC co-counsel (0.3); communicate with J. Rubinstein re status of AHC co-counsel discussions on material subject to privilege and mediation protections from disclosure (0.6).	.90	1,260.00
Sraders, S.	9/30/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, E. Kaminsky, and A. Gaske re strategy for adversary proceeding.	1.40	805.00
Sraders, S.	9/30/21	Confer with A. Gaske and E. Kaminsky re research memoranda.	.30	172.50
Sraders, S.	9/30/21	Confer with team re current status of proceedings and next steps.	.50	287.50

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Sraders, S.	9/30/21	Correspond with A. Gaske and E. Kaminsky re research tasks for adversary proceeding.	.40	230.00
Sraders, S.	9/30/21	Review chart of insurer interrogatory responses.	.40	230.00
Kaminsky, E.	9/30/21	Confer with team re adversary proceeding.	1.40	700.00
Kaminsky, E.	9/30/21	Confer with team re litigation status update and strategy.	.50	250.00
Kaminsky, E.	9/30/21	Confer with A. Gaske and S. Sraders re adversary research.	.30	150.00
Kaminsky, E.	9/30/21	Research Issues #1, #2 and #53 (1.2); draft memorandum re same (1.9).	3.10	1,550.00
Project Total:			262.00	\$ 217,897.00
TOTAL CHARGEABLE HOURS			409.80	
TOTAL FEES				\$ 341,180.50

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	33.50	1,700.00	56,950.00
Quinn, K.	8.60	1,100.00	9,460.00
Shore, R.	11.30	1,350.00	15,255.00
Holland, P.	1.90	290.00	551.00
Hudson, J.	27.50	725.00	19,937.50
Grim, E.	10.50	700.00	7,350.00
Rubinstein, J.	62.40	800.00	49,920.00
Wolf, D.	7.30	700.00	5,110.00
Frazier, H.	10.60	675.00	7,155.00
Rush, M.	23.40	675.00	15,795.00
Johnson, K.	17.80	230.00	4,094.00
Bonesteel, A.	8.90	315.00	2,803.50
Gaske, A.	32.50	575.00	18,687.50
Leveridge, R.	59.30	1,400.00	83,020.00
Ogrey, S.	6.20	230.00	1,426.00
Sraders, S.	32.70	575.00	18,802.50
Kaminsky, E.	46.10	500.00	23,050.00
Lloyd, M.	9.30	195.00	1,813.50
TOTALS	409.80		\$ 341,180.50

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TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	24.90	13,915.00
A004	Case Administration	10.40	2,066.50
A006	Employment / Fee Applications	1.90	551.00
A009	Meetings / Communications with AHC & Creditors	15.70	22,980.00
A019	Plan of Reorganization / Disclosure Statement	94.90	83,771.00
A020	Insurance Adversary Proceeding	262.00	217,897.00

EXPENSE DETAILS

E106: Online Research

Date	Description	Task	Amount
9/30/21	Westlaw	E106	131.65
9/30/21	PACER	E106	1,854.00
Sub-Total of Expenses:			\$ 1,985.65

TOTAL EXPENSES

\$ 1,985.65

TOTAL FEES AND EXPENSES

\$ 343,166.15